

1 HARRY S. STERN, SBN: 176854
2 TIMOTHY K. TALBOT, SBN: 173456
3 JACOB A. KALINSKI, SBN: 233709
4 RAINS LUCIA STERN ST. PHALLE & SILVER, PC
5 1428 2nd Street, Suite 200
6 Santa Monica, CA 90401
7 Tel: (310) 393-1486
8 Fax: (310) 395-5801
9 E-mail: JKalinski@RLSlawyers.com

10 WILLIAM B. AITCHISON (*pro hac vice*)
11 Public Safety Labor Group
12 3021 NE Broadway Street
13 Portland OR 97232
14 Tel: (866) 486-5556
15 Fax: (866) 401-2201
16 Will@PSLGlawyers.com

17 Attorneys for Plaintiffs

18 **UNITED STATES DISTRICT COURT**

19 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

20 THOMAS FERGUSON, and MIGUEL
21 ORTEGA, on behalf of themselves and
22 other similarly situated individuals,

23 Plaintiffs,

24 vs.

25 COUNTY OF LOS ANGELES,

26 Defendants.

27 CASE NO. 2:18-cv-06861-DSF-KKx

28 **NOTICE OF MOTION FOR
FINAL APPROVAL OF
SETTLEMENT**

Date: May 18, 2020

Time: 1:30 p.m.

Dept.: 7D

Judge: Hon. Dale S. Fischer

1 **TO THE HONORABLE COURT AND TO ALL PARTIES:**

2 Please take notice that on May 18, 2020 at 1:30 p.m. or as soon thereafter
3 as this matter may be heard in the above-entitled Court, located at First Street
4 Courthouse, 350 West 1st Street, Courtroom 7D, Los Angeles, California 90012,
5 Plaintiffs Thomas Ferguson and Miguel Ortega, on behalf of themselves and all
6 similarly situated individuals who have consented to join the instant action
7 ("Plaintiffs"), will move the Court for an order granting final approval of
8 settlement.

9 This motion is based upon Plaintiffs' Memorandum of Points and
10 Authorities in Support of Motion for Final Approval of Settlement, the
11 Declarations of William B. Aitchison, Derek Hsieh and Jacob Kalinski, the
12 complete files and records in this action, and upon such oral and documentary
13 evidence as may be allowed at the hearing of this motion.

14 This motion is made following the conference of counsel pursuant to L.R.
15 7-3 which took place on March 3, 2020.

16 Dated: April 13, 2020

Respectfully submitted,

17 **RAINS LUCIA STERN
18 ST. PHALLE & SILVER, PC**

19 /s/

20 By: Jacob A. Kalinski
21 Attorneys for Plaintiffs Thomas
22 Ferguson and Miguel Ortega, et al.
23
24
25
26
27
28